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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Public Notice)
)
Additional Comment Sought In)
Wireless Enhanced 911 Reconsideration Proceeding)
Regarding Rules And Schedules)

CC Docket No. 94-102

ADDITIONAL COMMENTS OF GTE SERVICE CORPORATION

GTE Service Corporation, on behalf of its telephone and wireless companies ("GTE") hereby submits its additional comments on the Commission's *Public Notice* in the above-captioned proceeding.¹ GTE joins with the signatories to the Joint Letter in calling for a number of modifications to the rules promulgated in this proceeding.

I. GTE SUPPORTS THE POSITIONS SET FORTH IN THE JOINT LETTER AS A REASONABLE ACCOMMODATION BETWEEN WIRELESS CARRIERS AND PUBLIC SAFETY OFFICIALS

The Commission seeks comment on an *ex parte* letter filed by two wireless trade associations (the Personal Communications Industry Association ("PCIA") and the Cellular Telecommunications Industry Association ("CTIA")), and three public safety organizations (the Association of Public Safety Officials-International, Inc. ("APCO"), the National Emergency Number Association ("NENA"), and the National Association of State Nine-One-One Administrators ("NASNA")).² The Joint Letter represents an

¹ FCC Public Notice, "Additional Comment Sought In Wireless Enhanced 911 Reconsideration Proceeding Regarding Rules and Schedules," DA 97-2751 (Oct. 3, 1997) ("*Public Notice*").

² Letter from PCIA, CTIA, APCO, NENA, and NASNA to Chairman Hundt
(Continued...)

agreement between wireless carriers and public safety officials that in light of certain technical realities, specific aspects of the *Report and Order* in this proceeding should be modified.³

In particular, the Joint Letter suggests that the Commission should eliminate references to the term "code identification," and instead use the term "successfully validated calls." Distinguishing between "all 9-1-1 wireless calls" and "successfully validated calls" will allow public safety agencies to choose whether they want to receive only the 911 calls that they can trace, or all 911 calls. Many public safety officials have indicated that this distinction is important, because the safety of rescue personnel is at greater risk in responding to calls that cannot be associated with a valid subscriber.

The Joint Letter also recognizes that without automatic location information ("ALI"), it is not possible to allow each PSAP to choose whether to receive all 911 wireless calls or only successfully validated calls. This is the case because each cell site is served by more than one PSAP, and, until ALI is implemented, there is no way to determine which PSAP will serve any given caller. Thus, regional 911 authorities — not individual PSAPs — must determine whether each cell site must pass on all wireless 911 calls or successfully validated calls.

(...Continued)

(Sept. 25, 1997) ("Joint Letter").

³ *Revision of the Commission's Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems*, 61 Fed. Reg. 40348 (1996) ("*Report and Order*").

Finally, the Joint Letter requests that in recognition of the technical obstacles to TTY/TDD compatibility with wireless E911 systems, the implementation deadline for this feature should be delayed for at least 18 months after October 1, 1997. This extension is necessary because digital wireless systems, and to a lesser extent, analog systems, are still incompatible with TTY/TDD devices. Although manufacturers and carriers are working hard to ensure such compatibility, this work is unlikely to be completed in less than 18 months.

GTE endorses all three of the aforementioned proposed modifications to the *Report and Order* as reasonable, negotiated solutions to the problem of aligning the needs of the public safety community with the current technical capabilities of wireless E911 systems. As a matter of process, the public interest is generally better served by privately negotiated solutions between interested parties to complex technical issues, such as the provision of wireless E911 service. As demonstrated by the instant compromise, negotiated solutions can lead to more optimal resolution of complex issues. Negotiated solutions are also easier to implement because the parties that are bound by them have already agreed to their terms and know they are capable of meeting them.

Substantively, GTE further notes that the Ad Hoc Alliance for Access to 911's ("Ad Hoc Alliance") opposition to the Joint letter is premised on a technical misconception that undercuts their position. Specifically, the Ad Hoc Alliance has assumed that cellular switches, as currently configured, are capable of providing call

back for all 911 callers, whether or not the call has been validated.⁴ As pointed out by GTE in its earlier filing, this is not correct. Rather, call back is not possible unless the mobile has been service initialized by the home carrier, has passed global challenge if authenticable in an authentication-enabled market, and has not had call delivery turned off.⁵ Thus, the Ad Hoc Alliance's suggestion that call back can, and should be immediately required for *all* wireless 911 callers should be rejected.

II. CONCLUSION

The Joint Letter represents a well thought out and reasonable compromise between the needs of public safety officials and the technical capabilities of wireless service providers. As such, its terms should be adopted by the Commission.

Respectfully submitted,

GTE Service Corporation and its telephone and
wireless companies

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⁴ Letter from Ad Hoc Alliance to Chairman Hundt at 1-2 (Sept. 30, 1997).

⁵ Letter from GTE to Mr. John Cimko, Chief, Policy Division, Wireless Telecommunications Bureau (July 7, 1997) (answer to question 5).